

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

FILED

MAR 13 2001

In the Matter of the Petition of)
Indiana Bell Telephone Company,)
Incorporated d/b/a Ameritech Indiana)
Pursuant to I.C. 8-1-2-61 For a Three)
Phase Process For Commission)
Review of Various Submissions of)
Ameritech Indiana to Show Compliance)
with Section 271(c) of The Telecommunications)
Act of 1996)

**INDIANA UTILITY
REGULATORY COMMISSION**

Cause No. 41657

March 12, 2001 Discussion Draft

**FOURTH JOINT PROGRESS REPORT REGARDING THE RESOLUTION OF
CERTAIN UNBUNDLED LOOP PROVISIONING ISSUES AND
REQUEST FOR AN EXTENSION OF THE xDSL COLLABORATIVE**

This Fourth Joint Progress Report supplements the Third Joint Progress Report, which was filed by the parties with the Commission in this proceeding on January 26, 2001.

In the Third Joint Progress Report the parties agreed to further collaborative discussions to define routine processes for conducting dial tone ("DT") and automatic number identification ("ANI") testing two days prior to the scheduled due date, and to implement a "non-coordinated" frame due time ("FDT") hot cut process. These newly resolved processes are described below. The parties are not aware of any unresolved issues regarding these processes at this time.

In addition, the parties agreed to discuss two issues relating to the loop provisioning process for unbundled stand-alone xDSL loops. As discussed below, the parties request additional time beyond March 9, 2001 to continue these xDSL collaborative discussions. The parties request leave to file a joint report advising the Commission of these resolved and unresolved xDSL issues on or before April 20, 2001.

A. Dial tone/ANI Testing

1. In the Third Joint Progress Report, Ameritech agreed to conduct a dial tone/ANI test on the day of cut, as a matter of course. In addition, for those CLECs who desire, Ameritech also agreed to conduct a dial tone/ANI test two days before due date (DD-2). As a result of further collaboration with the CLECs, Ameritech and CLECs have reached agreement on the following process and procedures for dial tone/ANI testing on DD-2.

2. CLECs who desire dial tone/ANI testing on DD-2 as a matter of course need only provide Ameritech a single notice of such desire. Once Ameritech receives such notice from a particular CLEC, it will conduct DD-2 dial tone/ANI testing for all coordinated and “non-coordinated” cutovers requested by that CLEC as a matter of course at no additional charge. A copy of the process to subscribe for such testing is attached as Attachment A.

3. As a result of the recent collaborative discussions, the parties have agreed to a routine DD-2 testing process that incorporates new mechanized components designed to reduce manual processes to the extent feasible. The new process flow and process description for the “Ameritech DD-2 DT/ANI Test Local Number Portability (“LNP”) with Loop Reuse” testing procedures are attached as Attachments B and C.

4. In the Third Joint Progress Report, Ameritech agreed to provide to the CLECs notice of a failed dial tone/ANI test conducted on DD-2 no later than 4 business hours after such test or by 10 a.m. on DD-1, whichever occurs first. As a result of further collaborative discussions, Ameritech agreed to develop a web site to enable more timely and complete access to information on the status of DT/ANI test results conducted on DD-2. Once this web site is deployed, the central office technician that performs the DT/ANI test on DD-2 will enter test results into their work tracking system, those results will then be posted to the web site

throughout the day on DD-2, allowing CLECs to view test results in near real time. The web site will also indicate the DT/ANI test results for each line tested, either "passed," "no dial tone," or "wrong ANI." A sample of the web site detail is attached as Attachment D. This notification process is shown in steps 5 and 6 of the process flow and description.

5. Finally, Ameritech agreed to discuss procedures in the event a failure is found during such dial tone/ANI test performed on DD-2. As a result of the collaborative discussions, the parties identified three potential options for the CLEC if the test is not successful. If the CLEC either finds a problem and corrects its translations or wiring or can not isolate the source of the problem it may request an optional DT/ANI test for a charge, it may request an escort ticket for a central office visit or may wait until the due date because Ameritech will perform another dial tone/ANI test as a matter of course on the date of cutover. These options are described in steps 8.1 and 8.2 of the process flow and description.

6. The parties have agreed to the following schedule to implement these changes. Because this process requires web site development and systems enhancements, Ameritech will review this process at the May 2001 CLEC User Forum and announce its intention to deploy a friendly user trial. The friendly user trial will begin on June 1, 2001 and will conclude on July 9, 2001. The parties recommend and agree that this friendly user trial of this mechanized process be evaluated as part of and included in the existing third party OSS testing. The third-party evaluation of this component of the process is in addition to, and does not replace the existing third party testing as described in the exit criteria of the Indiana MTP. During July the results of the friendly user trial will be shared and discussed with the collaborative, methods and procedures will be finalized and internal training will be conducted. The mechanized process will be fully deployed by August 1, 2001.

7. During the collaborative, the parties agreed that, based on actual experience of the new DT/ANI DD-2 option, any party may request modifications to existing performance measures or additional performance measures as part of the Performance Measurement Change Management Plan.

B. Desired Frame Due Time

1. In the Third Joint Progress Report, Ameritech agreed to implement a new “non-coordinated” frame due time (“FDT”) hot cut process. As a result of further collaborative discussions, the CLECs and Ameritech have reached agreement on the methods and procedures necessary for such process. The new process flow and process description for the “FDT - LNP with Loop Reuse” procedures are attached as Attachments E and F. In an effort to reduce manual components of the process, Ameritech will deploy a “Frame Due Time” web site for CLECs to confirm and validate their FDT orders and to eliminate the need for “cut sheets.” A sample of this web site is attached as Attachment G.

2. The parties believe that there are no unresolved “non-coordinated” frame due time cutover issues at this time, subject to implementation and testing of the process. There is one “open” issue reflected in step 1.13, but this is not a “disputed” matter.

3. The parties have agreed to the following schedule to implement these changes. Because this process requires web site development and systems enhancements, Ameritech will review this process at the April 2001 CLEC User Forum and announce its intention to deploy a friendly user trial. The friendly user trial will begin on April 30, 2001 and will conclude on May 16, 2001. The parties recommend and agree that this friendly user trial of this new frame due time hot cut process be evaluated as part of and included in the existing third party OSS testing.

The third-party evaluation of this new process is in addition to, and does not replace the existing third party testing as described in the exit criteria of the Indiana MTP. During the following 30 days the results of the friendly user trial will be shared and discussed with the collaborative, methods and procedures will be finalized and internal training will be conducted. The process will be fully deployed by June 18, 2001.

4. Ameritech will expand the existing coordinated hot cut ("CHC") performance measures to include FDT cutovers. These new performance measures will be discussed in the on-going six-month review process associated with the Performance Measurement Change Management Plan.

C. xDSL Cutovers

1. As noted in the Third Joint Progress Report, CLECs and Ameritech agreed to further collaborative discussions on two specific issues relating to the unbundled stand-alone xDSL loop provisioning process. First, CLECs requested that a process be developed to provide CLECs access to the circuit number for xDSL loops they intend to order during the pre-ordering process, even if such loops are currently being used by another carrier. In addition, CLECs requested that a process be developed to conduct a "proof of continuity" test for xDSL loops on Due Date-2.

2. Ameritech and CLECs have discussed both of these issues. Based on those discussions the parties agree that it is appropriate to request an extension for further discussions.

3. With respect to the issue of providing circuit identification numbers for CLEC to CLEC xDSL migrations, it is unclear at this time whether the CLECs have a uniform request of Ameritech regarding appropriate CLEC to CLEC xDSL migration procedures. The CLECs

agreed to meet in a CLEC-only meeting on March 12 - 13, 2001 to further discuss this issue. At the conclusion of that meeting, the CLECs will advise Ameritech whether they have a proposed approach(s) that they would like Ameritech to consider, or whether they have determined that this issue is more appropriately addressed in a broader forum given that it has industry-wide implications beyond the Ameritech or SBC regions.

4. With respect to proof of continuity testing, Ameritech confirmed that it has implemented xDSL acceptance testing, including "proof of continuity" in all five Ameritech states. Ameritech further confirmed that its internal practice is to perform the proof of continuity on the date the wiring work is done, which is targeted to be done on Due Date -1. Ameritech has acknowledged that its actual provisioning results for xDSL, PM 55.1, average installation interval-DSL, with and without conditioning, and PM 58, percent AIT missed Due dates for DSL loops, needs to improve. Accordingly, Ameritech has agreed to undertake root-cause analysis of this issue and take appropriate corrective actions.

5. The following is SBC/Ameritech's preliminary summary regarding various "root cause" analysis and corrective action procedures that SBC/Ameritech has recently undertaken or will be considering with respect to its unbundled xDSL loop provisioning results within the 13 state region. As this summary is being provided to CLECs for the first time in this document, it has not been the subject of any collaborative discussions among the parties. Until CLECs have such an opportunity for discussion, CLECs will reserve judgment on the validity of this analysis. To date, the "root cause" analysis performed on xDSL provisioning has focused to date on two areas: central office work functions and outside technicians work operations. One recent action involved central office ("CO") Certification for the following functions: splitter validation, channel facility assignment ("CFA") validation, and CO Technician Training. SBC/Ameritech

also reviews, on an on-going basis, database updates and validations to include the SWITCH provisioning system. Both of those examples are a root cause analysis and a corrective action. . Also, a modification to the existing Auto Complete processes within the Ameritech and Southwestern Bell regions became effective on February 13, and February 14, respectively. This change will improve the accurate provisioning of the DSL product. The orders that do not post complete within the Frame Operations Management System (“FOMS”) database by the Due Date will not auto complete in Work Force Administration (“WFA”) on the due date. As a proactive measure, Network is looking into the upgrading of the Mechanized Loop Testing (“MLT”) software to expand its functionality. The enhancement of the MLT software will be evaluated going forward and an announcement will be made when a decision is final. In addition, “root cause” analyses were done and continue to be done on misses related to the outside technician’s work activities. An internal objective was established in January to achieve a 95% completion on all field dispatches by the end of March. To support this improvement process, an unbundling sub-group was established within the Installation/Repair (I/R) Centers to performance manage unbundling orders, including DSL. Also, the I/R staff analyzes daily misses by supervisor and technician to determine problem areas and also performs weekly analysis on all misses to develop solutions and corrective action plans. In short, as represented to the collaborative, SBC/Ameritech is committed to on-going root cause analysis and corrective action plans to ensure that its performance is at or above a “satisfactory” level.

6. As a result of these continuing discussions, the parties request an extension until April 13, 2001 for further collaborative discussions. At the conclusion of such discussions, but no later than April 20, 2001, the parties will file a joint report advising the Commission of all resolved xDSL cutover issues. The parties further agree that unresolved xDSL cutover issues

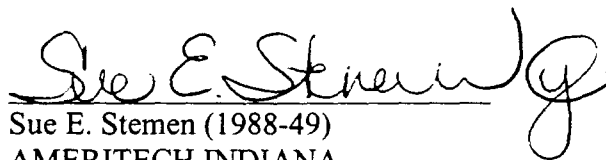
should be raised on April 20, 2001 through petitions filed in this case. The petition should include a summary of the issue and the parties' position. The process for these petitions shall be as described in Paragraph 7 of the initial Joint Progress Report filed in this case on July 28, 2000, unless the Commission has approved or required different dispute resolution procedures before the filing date (April 20, 2001), in which case, the parties anticipate using the new procedures.

D. Conclusion

The undersigned parties jointly submit to the Commission this Fourth Joint Report for the purpose of advising it of the resolution of the specified process improvements as set forth in this Fourth Joint Report. In addition, the parties request that the Commission issue an entry consistent with this Fourth Joint Report requesting an extension until April 20, 2001 to discuss the xDSL issues in this proceeding.

Dated: March 13 , 2001

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Sue E. Stemen". The signature is fluid and cursive, with a large, stylized "y" at the end.

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[electronic signature authorization]
Time Warner Telecom

/electronic signature authorization/
Worldcom

[electronic signature authorization]
Z-TEL Communications, Inc.

[electronic signature authorization]
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Indiana, Inc. d/b/a Sprint

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served upon the following this 13th day of March, 2001.

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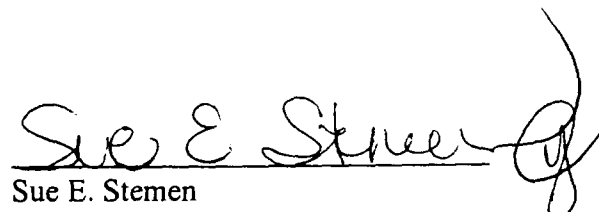
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CLEC Subscription Process for Dial Tone/ANI Test DD-2

The Dial Tone/ANI Test performed on Due Date -2 is an optional test offered to CLECs willing to provide Dial Tone on DD-2 for Coordinated Hot Cut and FDT Reuse orders (LNP with Loop Reuse). Once a CLEC subscribes to the service, Ameritech will perform the DT and ANI test on a routine basis for the CLEC on DD-2 (the WOT Date).

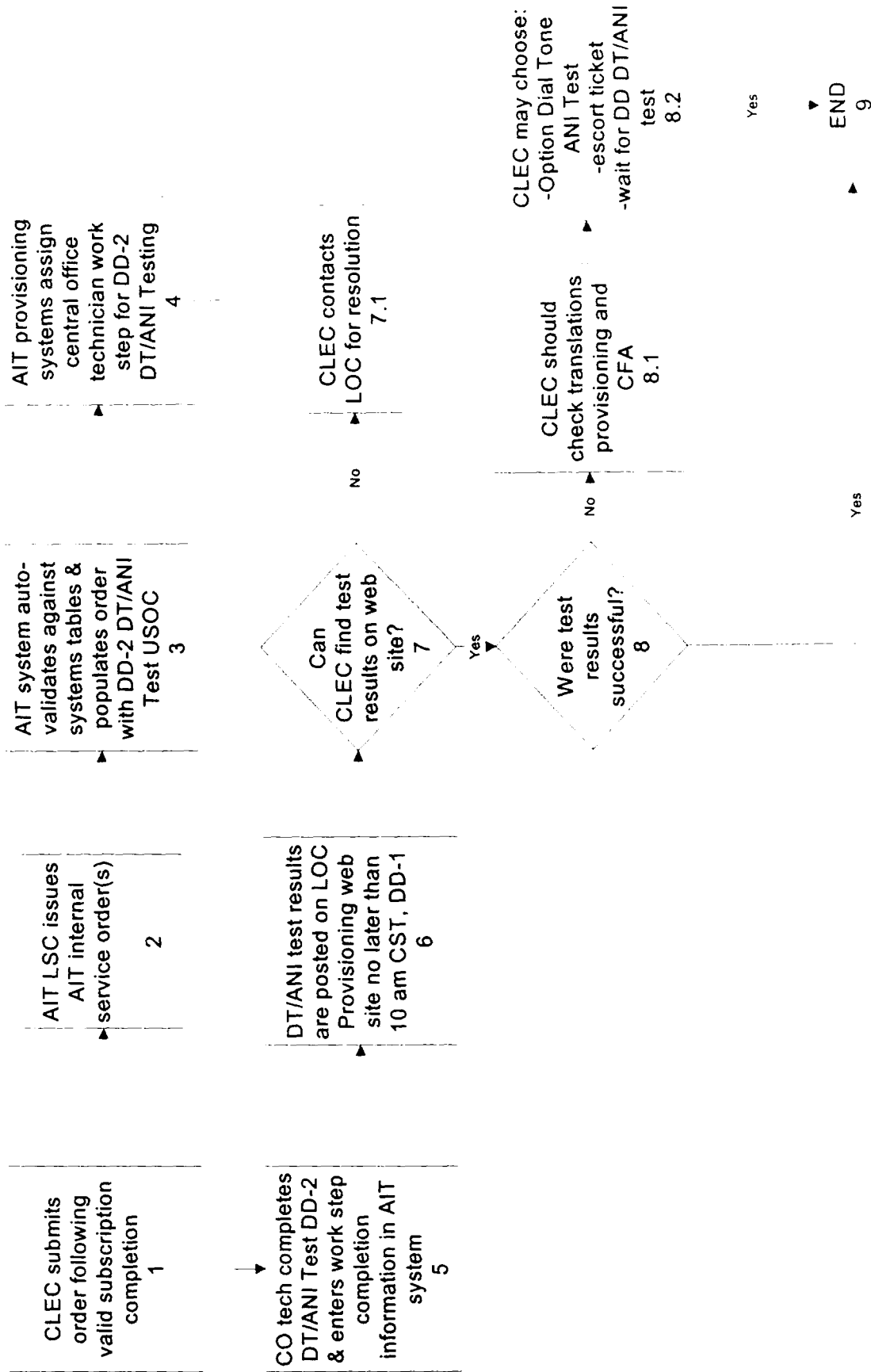
CLECs interested in the DT/ANI Test must subscribe for the service by providing the "Subscription Form" via email to the Ameritech LOC Project Manager. The DT/ANI tests will begin on the 1st or 15th day of the month dependant upon the "Subscription Form" receipt. Subscriptions received by the 1st of the month will be processed and the CLEC will be programmed for the tests to begin on the 15th of the month and Subscriptions received by the 15th of the month will be processed and the CLEC will be programmed for the tests to begin on the 1st of the next month. It is critical that the proper CLEC contact information must be provided for communications needs. The failure to provide complete and accurate information could result in a delay of testing implementation.

Once the "Subscription Form" is received from the CLEC, the Ameritech LOC Project Manager will forward the subscription notice to the appropriate CLEC Account Manager and Service Manager. The LOC Project Manager will respond to the CLEC Contact identified on the Form, verifying the subscription request has been received and proper system programming will begin.

Three days prior to the implementation day (1st or 15th of the month depending on when the Subscription was received) of the DD-2 DT/ANI Test, the LOC Project Manager will contact the CLEC validating the readiness of the systems for the tests.

On the implementation day the CLEC will begin receiving DT/ANI Test results DD-2 on the LOC Provisioning website.

Ameritech DD-2 DT/ANI Test LNP with Loop Reuse



DD-2 DT/ANI Test LNP with Loop Reuse

STEP	ORDER PROCESS DESCRIPTION:
1	CLEC submits order following valid subscription completion (see subscription process). Qualifying orders consist of CHC and FDT LNP with Loop Reuse (LSNP) and a valid "DFDT" entry.
2	AIT LSC issues AIT internal service order(s).
3	AIT system auto-validates order information against systems tables and populates order with DD-2 DT/ANI Test USOC. In order for positive validation to occur: <ul style="list-style-type: none"> ▪ Order ACNA must match ACNA for a subscribed CLEC ▪ Order must be for CHC or FDT LNP with Loop Reuse (LSNP) ▪ Order must have "DFDT" entry
4	Ameritech provisioning systems assign work step for the central office technician to perform DD-2 test
5	On DD-2, the central office technician completes the DD-2 test confirming DT/ANI information available. DT/ANI testing will always be performed at the CLEC CFA prior to connection to Ameritech's jumper. Whenever possible, DT/ANI testing will also be performed through to the Ameritech advanced jumper.
6	DD-2 test results are posted on the LOC provisioning web site throughout the day on DD-2 and no later than 10 am, CST, DD-1. The three possible test results are: <ul style="list-style-type: none"> ▪ Tested OK ▪ Incorrect ANI ▪ No Dial Tone
7	CLEC may check for updates throughout DD-2 and until 10 am CST, DD-1. If test results are not posted by 10 am, CST, DD-1, CLEC should follow step 7.1 to obtain results.
7.1	No – CLEC contacts LOC for resolution. CLEC is responsible for comparing responses on orders from their cut sheet, to orders displayed on the web. If an "LSC" notation is indicated on the Cut Sheet, DT/ANI results may be posted as late as Due Date.
8	YES – Were the test results successful (i.e. DT and correct ANI validated)?
8.1	<ul style="list-style-type: none"> ▪ NO – Either NDT (No Dial Tone) or Wrong ANI were found. CLEC should check translation provisioning & CFA Assignment/wiring. If CLEC finds a problem with their translations or CFA, corrective action should be taken.
8.2	Upon completion of corrective action or If CLEC does not find a problem they may: <ul style="list-style-type: none"> ▪ request an optional DT/ANI test ▪ request an escort ticket ▪ wait until the DT/ANI test on DD (step 9)
9	End – Dial Tone ANI Test will be performed as normal for FDT or CHC orders on Due Date and order will follow applicable FDT or CHC process for completion.



CLEC Provisioning - Local Operations Center

User ID:

Password:



SAMPLE

Confidential. Solely for use by employees of SBC companies with a need to know.

Not to be disclosed to or used by any other person without prior authorization.

Order Search - Coordinated Hot Cuts

PON:

Ameritech SON:

Due Date:

Central Office:



SAMPLE

Order Details

Order Type: CHC

SON: C2487676766

PON: LOC-123

End User: John Doe Company

Time: 8:00

Lines: 12

DT/ANI Check

Lines:

1	TXNU...	No Dial Tone
2	TXNU...	Wrong ANI
3	TXNU...	Passed
4	TXNU...	Passed
5	TXNU...	Passed

CHC Orders Scheduled: 12/01/01

SON	Lines	Date & Time
<u>C2487676766</u>	5	12/1/01 8:00

<u>C2487676766</u>	7	12/1/01 10:00
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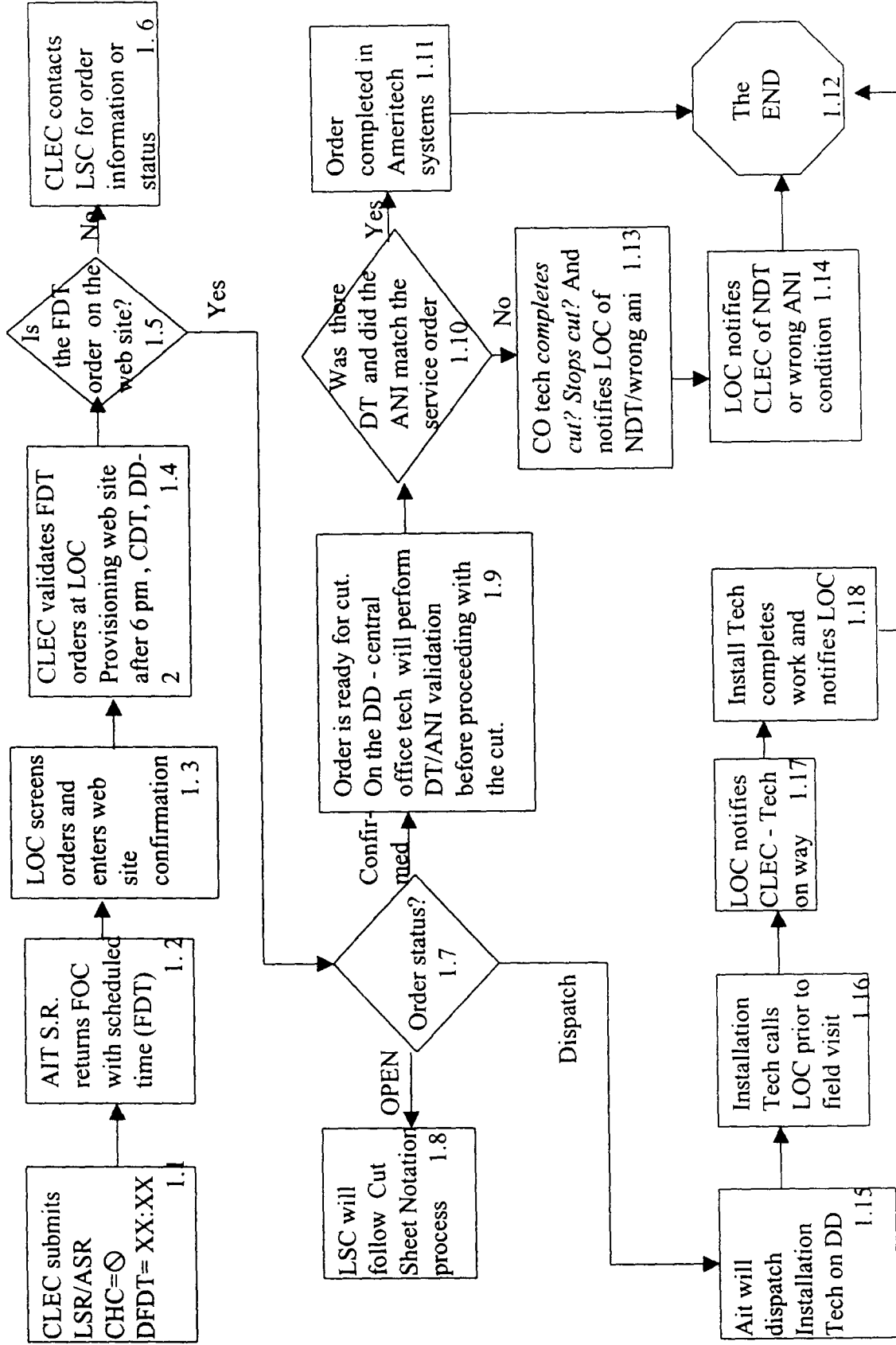
<u>C2487673872</u>	5	12/1/01 13:00
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<u>C2487633336</u>	5	12/1/01 8:00
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PRINT

SAMPLE

FDT - LNP with Loop Reuse

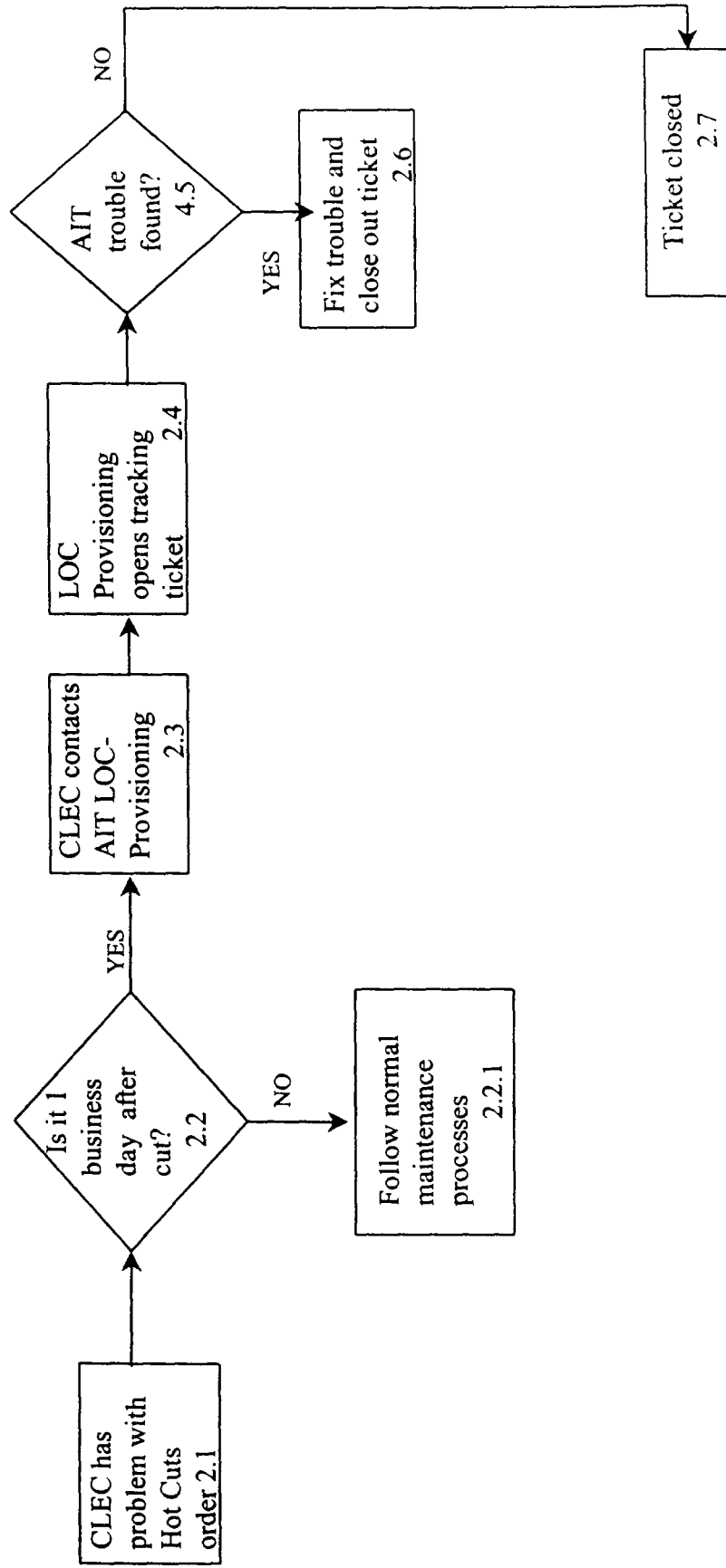


2/28/01

Issue 3
Ameritech - DRAFT

FDT

Post Conversion



FDT – LNP with Reuse Loop

STEP	DESCRIPTION
1.1	<p>CLEC issues ASR and LSR with Related Purchase Order Numbers (RPONs) on both orders. Also, leaves the CHC field blank and inputs desired cut time in the DFDT field (required).</p> <ul style="list-style-type: none"> - Valid times are 8am – 5 pm (latest cut time) for the Central Office time zone. - FDT cuts are only available Monday through Friday. - D (Port) order for FDT will be written with 11:59 pm. - Minimum 5-day DD interval i.e. 5 business days from LSR submission. - ANI will be validated against the TN provided in the CKR field of the ASR/LSR.
1.2	Ameritech Service Representative returns FOC with scheduled time (FDT). If requested time is not available, the cut will try to be scheduled for the next closest available time (the same day) and if there is no available time for the originally requested day, the originally requested time for the next day will be scheduled.
1.3	On DD-2 the LOC screens the service orders and "confirms" order for web site updating.
1.4	CLEC may validate FDT orders on the LOC Provisioning web site after 6 pm, CDT, DD-2.
1.5	Is the FDT order on the web site?
1.6	No – CLEC contacts LSC for order information/status. The LSC will investigate the reason for the orders absence on the web site and communicate with the CLEC.
1.7	Yes – What is the order status?
1.8	Open – The LSC will follow the Cut Sheet Notation Process for Open orders and respond to the CLEC within the outlined timeframes.
1.15	Dispatch (all day cuts) – AIT will dispatch an Installation Technician on the due date
1.16	Installation Technician will call the LOC prior to field visit.
1.17	LOC will notify the CLEC that the Installation Technician is on the way to the customer's location.
1.18	Installation Technician completes field work and notifies LOC of

FDT – LNP with Reuse Loop

	work completion.
1.9	Confirmed – Order is ready for FDT cut. If there are problems with an FDT order once it has been confirmed on the web site, the CLEC can call any LOC MA at the main 800# for assistance. On the DD at the scheduled cut time, the Ameritech Central Office Technician will perform a DT/ANI validation before proceeding with the cut.
1.10	Is there Dial Tone and did the ANI match the CKR field on the Service Order?
1.11	Yes – Central Office technician completes the CO work and closes the cut ticket to LOC. Upon receipt of the closed ticket, the LOC completes the order in the Ameritech systems. Note: Performance Measure 114.1 details the time intervals associated with CHC and FDT orders.
1.13	NO – The Central Office Technician completes cut? Stops cut? And notifies the LOC of No Dial Tone or wrong ANI condition.
1.14	LOC calls the CLEC to notify them of the No Dial Tone or wrong ANI condition.
1.12	END
2.1	CLEC has problem with FDT order.
2.2	Is it 1 business day after cut?
2.3	No - Follow normal maintenance processes.
2.4	Yes - CLEC contacts AIT LOC- Provisioning.
2.5	LOC Provisioning opens tracking ticket. Note: Ticket resolution time is no different, 24 hours).
2.6	Is an Ameritech trouble found?
2.7	No – Close ticket. Advise CLEC that No trouble was found.
2.8	Yes - Fix trouble and close out ticket. LOC notifies CLEC trouble cleared.

FDT – LNP with Reuse Loop

GLOSSARY OF TERMS

AIPC	Ameritech ISDN Provisioning Center
AIT	Ameritech
ANI	Automatic Number Identification
ASR	Access Service Request
CFA	Connecting Facility Access
CLEC	Competitive Local Exchange Carrier
CP	Cable Pair
CO Tech	Central Office Technician
DD	Due Date
DT	Dial Tone
FDC	Field Dispatch Center
FMOD	Facilities Modification
FOK	Found OK
IDLC	Integrated Digital Loop Carrier
ISDN	Integrated Services Digital Network
IT	Installation Technician
LSC	Local Service Center
LSR	Local Service Request
LST	Line & Station Transfer
LOC	Local Operations Center
SP	Service Provider
SUP	Supplemental Order



CLEC Provisioning - Local Operations Center

User ID:

Password:



SAMPLE

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Order Search - Frame Due Time

CLEC PON:

Ameritech SON:

Due Date:

Central Office:



SAMPLE

Order Details

Order Type: FDT

SON: C2487676766

PON: LOC-123

End User: John Doe Company

Time: 8:00

Lines: 12

Central Office: WPCAWI11

FDT Orders Scheduled: 12/01/01

SON	Lines	Time	Status
<u>C2487676766</u>	12	8:00	Confirmed

<u>C2487348126</u>	7	10:00	Confirmed
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<u>C2487609803</u>	5	13:00	Open
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PRINT

SAMPLE